IN THE CIRCUIT COURT OF THE 13TH JUDICIAL CIRCUIT

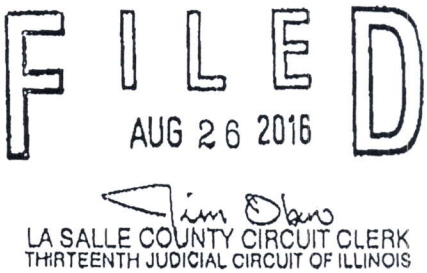
LASALLE COUNTY, ILLINOIS

NO. 15 F 153

Kevin R. Kramer,
Petitioner,

vs.

Julia C. Eickmeier,
Respondent.



MOTION FOR RULE 215 EXAMINATION OF KEVIN KRAMER AND THE MINOR

NOW COMES the Respondent, Julia C. Eickmeier, by and through her attorney James M. Durkee of Malmquist & Geiger, LLC, and hereby states in support of her Motion for Rule 215 Examination as follows:

1. Both parties in this Cause continue to seek modification of parenting responsibilities and parenting time.

2. Respondent's allegations consist of claims of sexual acts conducted by the Petitioner upon the Minor, M.K. (the "Minor"). Petitioner denies the same.

3. While this Court has ruled that evidence has thus far been insufficient to sustain Respondent's claim, a Rule 215 examination of both the Petitioner and the Respondent has a high likelihood of revealing relevant and probative information, and further may be the best possible evidence available to date.

4. Given the nature of the allegations, Respondent has sought a psychological examiner capable of performing a psychosexual evaluation, and proposes Dr. Mark Brenzinger, licensed clinical psychologist and sex offender evaluator and treatment provider, Midwest Behavioral Risk Management, P.C., 869 East Schaumburg Road., Suite 252, Schaumburg, Illinois 60194, for the evaluation of the Petitioner.

5. Respondent proposes Dr. Alexander J. Paret, PHD, a licensed clinical psychologist, 5250 Old Orchard Rd., Suite 300, Skokie, Illinois 60077, for the examination of the Minor.

6. Respondent requests the results of such examinations be provided to the Court and the parties pursuant to Illinois Supreme Court Rule 215, and further be permitted as evidence upon proper foundation and authentication, if requested.

WHEREFORE, Respondent respectfully requests this Honorable Court enter an Order for the Rule 215 Examination of Petitioner Kevin R. Kramer and the Minor, M.K. in accordance with the instant Motion, and for all further relief this Court deems equitable and just.

Dated: 8-24-16

RESPECTFULLY SUBMITTED,

Julia C. Eickmeier, Respondent

By _____
One of Her Attorneys

James M. Durkee - Trial Attorney
(6296297)
Malmquist & Geiger LLC
415 Liberty St.
Morris, IL 60450
815-942-5072

PROOF OF SERVICE

The undersigned certifies under penalties as provided by law pursuant to Section 1-109 of the Illinois Code of Civil Procedure, that on 8-24, 2016, a copy of the foregoing instrument was served upon the following:

Mr. Robert B. Steele
Aplington, Kaufman, McClintock, Steele & Barry Ltd.
P.O. Box 517
160 Marquette St.
La Salle, IL 61301

Nenya Giles, Asst. Attorney General
Attorney for the State of Illinois
16 West Cass St., 4th Floor
Joliet, IL 60432

by the method specified below:

___ by **personally delivering** a copy to the person in charge of the above referenced office before the hour of 5:00 p.m. on the date specified.

X by enclosing the same in an envelope addressed to such person at the address indicated, with postage fully prepaid, and by depositing said envelope in a U. S. Post Office **Mail** Box in Morris, Illinois, on the date specified, before 5:30 p.m.

___ by transmitting a copy by facsimile to the **facsimile** number noted under the name(s) above before 5:30 p.m.

___ by enclosing a copy in an envelope addressed to such person at the address indicated, with postage fully prepaid, by **certified mail, return receipt requested,** and by depositing said envelope in a U.S. Post Office Mail Box in Morris, Illinois, on the date specified, before 5:30 p.m.

___ by serving a copy of the foregoing instrument to such person in **open Court** on the date specified.

_____ by delivering a copy to such person through a **third party commercial carrier**-including deposit in the carrier's pick up box or drop off with the carrier's designated contractor- enclosed in a package, plainly addressed to such person, with the delivery charge fully prepaid, on or before 5:30 p.m. on the date stated.

_____ by transmitting a copy via **e-mail** to such person at the above designated e-mail address on or before 5:30 p.m. on the date specified.

_____ by transmitting a copy to such person through a service provider that provides an **electronic in-box** to such person's in-box address on or before 5:30 p.m. on the date specified.

Wendy L. Schlumtz